

Cumulative Impacts

History, Evolution, and Status

Shankar Prasad, M.B.B.S

Executive Fellow

Coalition for Clean Air

NEJAC Member

Why Focus on CI

- **Current Regulatory Paradigm**
 - Single Pollutant / Single Facility
- **Contradictory to Real Situation**
 - Multiple Pollutants / Sources
 - Demographics / Susceptibility
 - Proximity / known vs. unknown

Pollution Burden Matrix

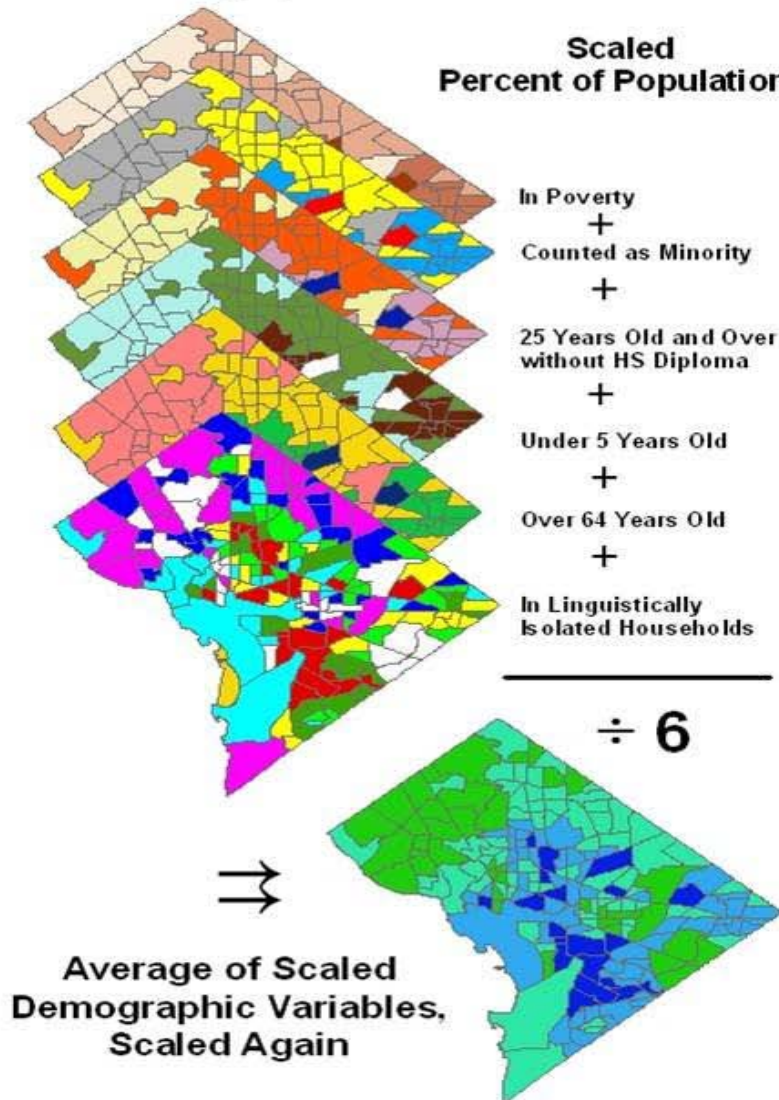
- Inherent bureaucratic delay
- NEJAC's Conceptual Framework(03)
- Qualitative in Nature / Screening Tool
- Proxy indicators readily available
- Pragmatic and practical
- Considers community concerns

EPA - OEJ Leadership

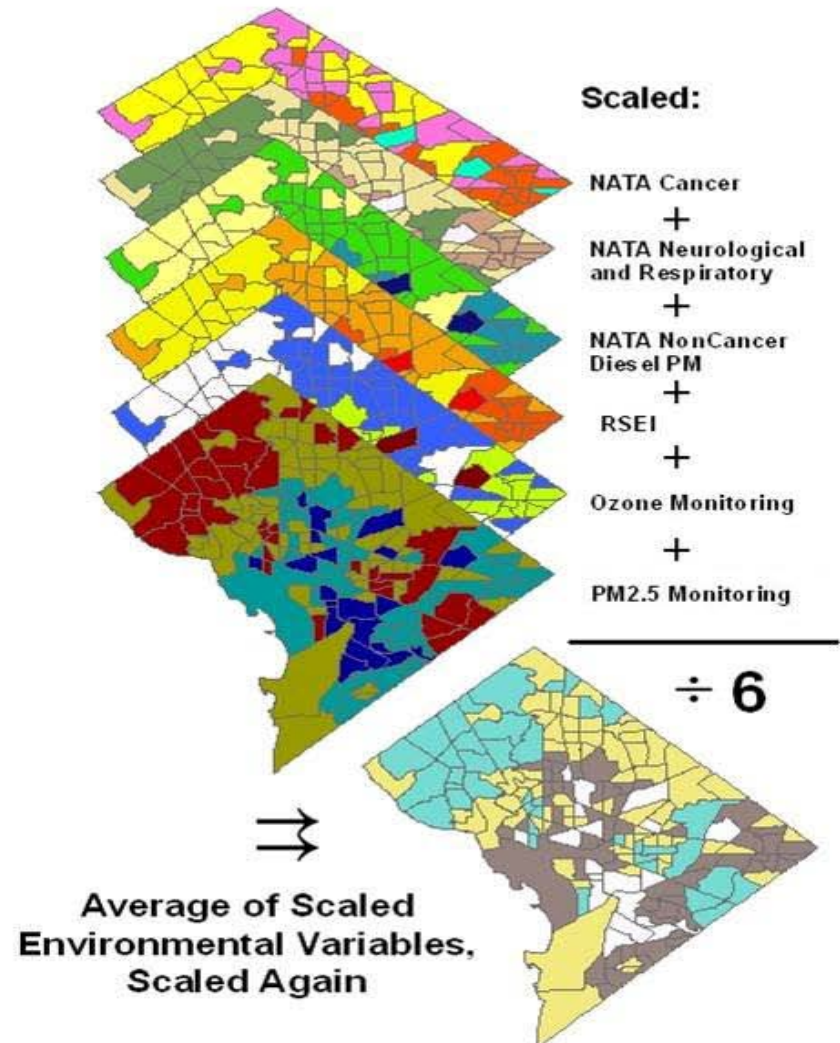
- Initiated EJSEAT effort with a team
- Pilot tool presented to the NEJAC
- 4 sets of indicators (total of 18)
 - Socio-demographic (6)
 - Environmental (4)
 - Health (2)
 - Compliance (4)
- Census tract – unit of analyses

Data Elements and Scoring

Social Demographic Indicators

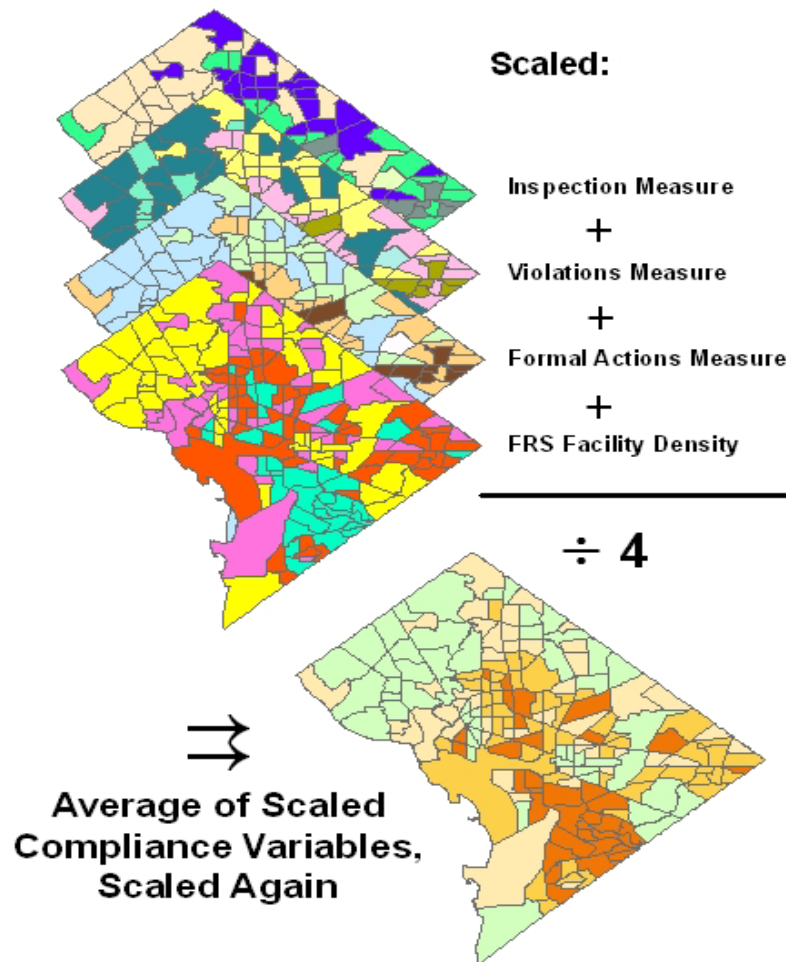


Environmental Indicators

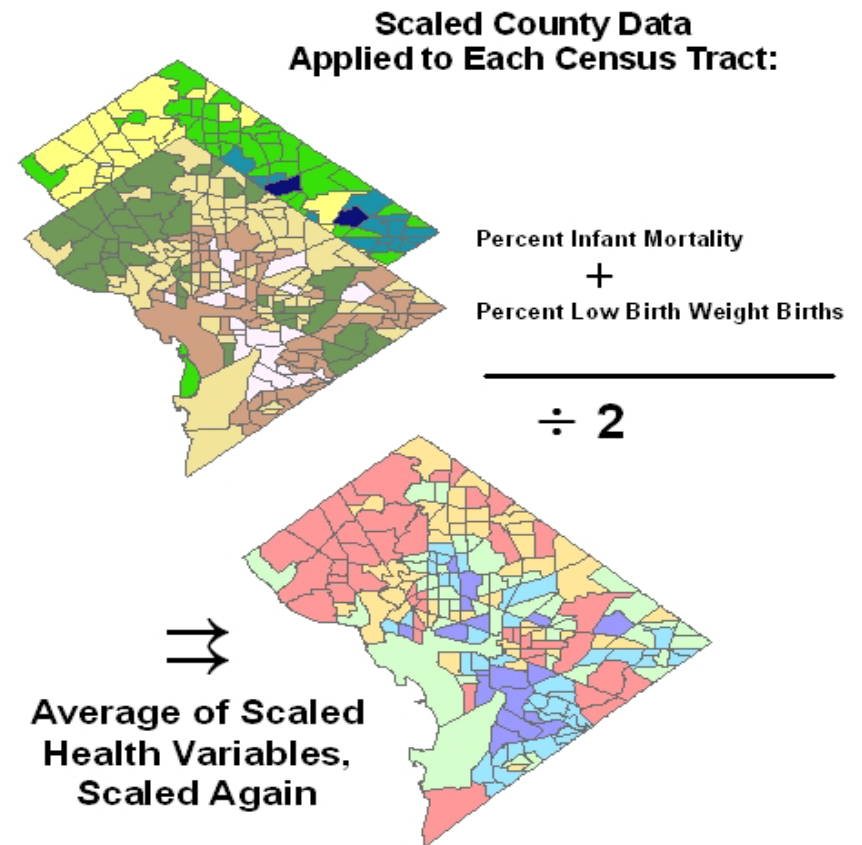


Data Elements and Scoring *cont'd*

Compliance Indicators



Health Indicators



NEJAC Comments

- Step in the right direction / Good Tool
- Improve the tool quality by focusing on
 - data quality, input level
 - sensitivity analyses for individual indicators
 - normalizing for tracts/state
 - appropriateness of health indicators
 - comparison between the states??

EJ SEAT Status

- Working group formed
- Providing comments/input to improve the tool
- EPA will modify accordingly
- Eventually have a final version

California's Progress

- CI definition by CEJAC – giant step
- Pilot Projects by Cal/EPA
- Pastor/Sadd/Frosch Project
- CIPA work group
- OEHHA / UC Berkeley effort
- Legal Barriers/ Policies/ Method(s)
- CI in AB 32

AB-32 Requirements

“when designing any market-based compliance mechanism and regulations consider the potential for direct, indirect, and **cumulative emission impacts** from these mechanisms, including **localized impacts** in communities that are already adversely impacted by air **pollution**, as well as prevent any increase in the emissions of toxic air contaminants or criteria air pollutants”

CCA's Proposed Concept (to meet the intent & mandate)

- Identify communities currently having higher Pollution Burden (cumulative impacts)
- Restrictions / Incentives for sources in impacted communities to participate in market-based compliance programs
- Create Community Benefits Fund to assist with adaptation & emission reduction measures

What Next

- Political will and Leadership
OEHHA, Cal/EPA
- ID gaps / Policies/ Method –Input
CIPA WG
- Influence on future siting, zoning,
smart growth, societal willingness to
CHANGE - BAU scenario